

# EXHIBIT B



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

May 30, 2019

**BY EMAIL**

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Re: *Alterra Am. Ins. Co. v. NFL, et al.*, No. 652813/2012  
*Discover Prop. & Cas. Co. v. NFL, et al.*, No. 652933/2012 (the "Coverage Actions")

Dear Mark and Heather:

We write on behalf of the 32 Non-Party NFL Member Clubs (the "Non-Party Teams") concerning their initial production in response to the Insurers' subpoenas.

In accordance with the Court's April 29, 2019 Order, the Non-Party Teams will be making a production of non-objectionable documents responsive to the Subpoenas on or before June 1, 2019, using the agreed Search Terms but excluding from production documents that are either privileged or subject to applicable statutory, regulatory, or common law providing privacy protection to an individual's medical or health information, whether under federal laws or state law (the "Excluded Documents").

The Non-Party Teams intend to produce non-objectionable documents to the extent they exist from the following custodians: (a) Head Athletic Trainers from each team's inception through July 19, 2011; (b) Head Equipment Managers from each team's inception through July 19, 2011; and (c) employees of each team (if any, and from each team's inception through July 19, 2011) that were members of the following NFL Committees: (i) the Mild Traumatic Brain Injury Committee; (ii) the Head, Neck and Spine Committee, and (iii) the Injury and Safety Panel (collectively, the "Custodians"). The Non-Party Teams have been and are still in the process of collecting and reviewing data that hit on to the Search Terms from individuals who qualify as such Custodians.

For purposes of the anticipated production to be made on or before June 1, 2019, the Non-Party Teams have run the Search Terms on documents collected from 39 different Custodians. As a result of this review, the Non-Party Teams expect to produce 4,361 non-objectionable documents, totaling more than 16,519 pages, on or before June 1, 2019.

In addition to the above, as of May 30, 2019, the Non-Party Teams have collected data from 23 additional custodians, and are expecting data from 43 more additional custodians. The Non-Party Teams have run the Search Terms on this additional data, and are currently in the

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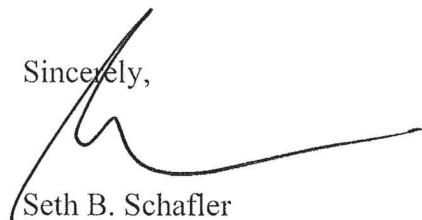
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process of reviewing additional potentially responsive documents. The Non-Party Teams hope to make a significant supplemental production by June 14, 2019.

Furthermore, the Non-Party Teams are continuing to identify and collect additional potentially responsive documents. As these documents are collected, efforts are being made to expeditiously have the documents searched, reviewed, and, as appropriate, produced in a timely manner.

Despite diligent efforts, it is possible that the Non-Party Teams may not be able to complete their productions in response to the Subpoenas (other than the Excluded Documents) before June 14, 2019. However, assuming the continuation of the status quo (*e.g.*, all Subpoena-related issues will be addressed exclusively in the New York court), the Non-Party Teams intend to work diligently to complete their production as soon as practical.

Sincerely,

A handwritten signature in black ink, appearing to read "Seth B. Schafner". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

cc: Counsel of Record (via email)